

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

CRANE COMPOSITES, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.
	)	
NORTHWOOD MANUFACTURING, INC.	)	
	)	
Defendant.	)	

**NOTICE OF REMOVAL**

In accordance with 28 U.S.C. §§ 1441 and 1446, defendant Northwood Manufacturing, Inc. (“Northwood”), by and through its attorneys, Bates & Carey LLP, with full reservation of any and all defenses, objections, and exceptions, including lack of personal jurisdiction and improper venue, hereby provides Notice of Removal of this civil action from the Circuit Court of Cook County, State of Illinois, to the United States District Court for the Northern District of Illinois. In support thereof, defendant states as follows:

1. On or about September 3, 2009, Plaintiff Crane Composites, Inc. (“Crane”), a Delaware corporation, commenced this action in the Circuit Court of Cook County, State of Illinois, Case No. 09-L-10478. The Circuit Court of Cook County, State of Illinois is within the judicial district of this Court.
2. All process, pleadings, and papers served upon Northwood are attached hereto as Exhibit A.
3. The Summons was served on Northwood on September 9, 2009 in the State of Oregon via the LaSalle Process Servers. Northwood first received a copy of the Summons and Complaint on September 9, 2009.
4. This Notice is timely filed pursuant to 28 U.S.C. § 1446(b).

5. Northwood may remove this action under the provisions of 28 U.S.C. § 1441 because it is not a citizen of Illinois.

6. This Court has subject-matter jurisdiction under 28 U.S.C. § 1332 because this matter is a civil action in which the amount in controversy exceeds \$75,000, exclusive of interest and costs, and is between citizens of different states.

7. Complete diversity of citizenship exists between Crane and Northwood in that (a) Crane is a corporation organized under the laws of the State of Delaware with its principal place of business in the State of Illinois, and (b) Northwood is a corporation organized under the laws of the State of Oregon with its principal place of business in the State of Oregon.

8. Northwood is the only defendant in this case and it consents to removal.

9. Concurrently with filing this Notice of Removal, Northwood is giving written notice of the filing of this Notice of Removal to all parties of record, and is filing a copy of the Notice of Removal with the Clerk of the Circuit Court of Cook County, State of Illinois, as required by 28 U.S.C. § 1446(d).

WHEREFORE, Northwood respectfully requests that this action be removed from the Circuit Court of Cook County, State of Illinois, to this Court as a removed claim or cause of action under 28 U.S.C. §§1441 and 1446.

Dated: October 9, 2009

Respectfully submitted,

By: /s/ Michael T. Skoglund

Joseph Pozen  
Michael T. Skoglund  
Bates & Carey LLP  
191 N. Wacker Drive, Suite 2400  
Chicago, Illinois 60606  
(312) 762-3100  
(312) 762-3200 (fax)

**ATTORNEYS FOR NORTHWOOD  
MANUFACTURING, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that on October 9, 2009, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system pursuant to its Administrative CM/ECF Rules, and on this date, I placed in the United States Mail, a copy of the foregoing Notice of Removal, postage prepaid and properly addressed to the counsel listed below:

Brad B. Falkof  
Jaafar A. Riazi  
BARNES & THORNBURG LLP  
One N. Wacker Dr., Suite 4400  
Chicago, IL 60606  
(312) 357-1313

*Attorneys for Plaintiff*

/s/ Michael T. Skoglund

Joseph Pozen  
Michael T. Skoglund  
Bates & Carey LLP  
191 N. Wacker Drive, Suite 2400  
Chicago, Illinois 60606  
(312) 762-3100  
(312) 762-3200 (fax)

**ATTORNEYS FOR NORTHWOOD  
MANUFACTURING, INC.**

313467